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REMARKS

The claim relates to two different sides of a wafer, including a first side that is to be electrodeposited and a second or opposite side that is to be protected from electrodeposition. Electrical contacts make contact to the first side.

The limitation that is missing in the cited reference to Brogden is a base to seal the second side of the wafer. In the cited reference, the first side is the lower side of the wafer 24, shown in Figure 4. It is the side on the underside of the page on which the figure is depicted. We know this because the contacts 36 contact the underside. Thus, the second side is the top of the wafer or the upper surface of the page on which Figure 3 is printed.

The question then becomes what protects that upper side from being electrodeposited? The office action suggests that it is the sealing ring 40. But this is not true. As clearly explained in the specification, it is the lid 50 that protects the upper side of the wafer from electrodeposition:

Thus, a sealing connection is formed on one side of the wafer 24 to prevent exposure of the electroplating solution, while the lid 50 keeps the other side of the wafer unexposed to the electroplating solution.

See column 3, lines 59-62. Obviously, then, the sealing ring 40 is insufficient to protect the second side, unlike the situation in the present application.

In the response to arguments, it was noted that "... the base in claim 1 directly contacts the first side of the wafer, to seal the second side of the wafer. Brogden exactly matches this structure." To the contrary, he does not. He needs the cover 50 to protect the second side because the asserted base 40 is ineffective for this purpose, as explicitly pointed out by Brogden.

Therefore, reconsideration would be appropriate.

Respectfully submitted,

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